



November 18, 2005

**VIA ELECTRONIC FILING**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: E911 Requirements for IP-Enabled Service Providers; WC Docket No. 05-196  
*Ex Parte* Filing of Lingo, Inc. and Primus Telecommunications, Inc.**

Dear Ms. Dortch:

On November 18, 2005, Mr. Ravindra Bhatia of Lingo, Inc. ("Lingo"), Mr. John Butler and Ms. Kathleen Lawrence of Primus Telecommunications, Inc. ("Primus"), and Mr. Walter Stone of both Lingo and Primus met with Ms. Michelle Carey of the FCC to discuss the E911 requirements for IP-Enabled Service Providers. The items discussed are presented below.

- ) The extent to which Lingo will be able to provide 911 service in compliance with the applicable FCC rules by November 28, 2005, based on the current progress of its third party E911 provider;
- 2) The unique position that Lingo is in with respect to its marketing activities over the internet;
- 3) The applicability of E911 requirements for Lingo customers residing outside of the United States;
- 4) The applicability of E911 requirements for business customers purchasing Primus's VoIP service; and
- 5) The automatic detection mechanism technology and its applicability to the Lingo and/or Primus products.

Please direct any questions regarding this matter to the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to be "WLS", written over a horizontal line.

Walter L. Stone  
Lingo, Inc. & Primus Telecommunications, Inc.

cc: Michelle Carey, FCC